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The Honorable Ricardo S. Martinez

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHN . KIVLIN  
vs.  
CITY OF BELLEVUE, et al.

Plaintiff,

Defendants.

No. 2:20-cv-00790-

PLAINTIFF'S MOTION TO FILE  
OVERLENGTH BRIEF IN RESPONSE  
TO DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT

NOTED FOR 5/14/21

Comes now Plaintiff, by and through his attorney of record, PATRICIA S. ROSE, and pursuant to LCR 7(f), does file this motion for an amended and overlength brief in response to Defendant's Motion for Summary judgment. This motion is based on the following facts, certified to by counsel's signature below:

Defendant has sought dismissal of the entirety of Plaintiff's claims which are numerous and the motion premised on a number of legal theories as opposed to factual ones. However, to

PLAINTIFF'S MOTION  
TO FILE OVERLENGTH  
BRIEF UNDER LCR 7 - 1

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patty@pattyroselaw.com

1 adequately respond requires counsel to provide both detailed legal analysis and an extensive  
2 statement of facts outlining Plaintiff's experience and the events giving rise to the litigation.

3 For all of these reasons, Plaintiff seeks to file an overlength brief totaling no more than  
4 30 pages.

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7 Dated this 11<sup>th</sup> day of May 2021

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**LAW OFFICE OF PATRICIA S. ROSE**

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s/Patricia S. Rose

Patricia S. Rose, WSBA No. 19046

Attorney for Plaintiff

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PLAINTIFF'S MOTION  
TO FILE OVERLENGTH  
BRIEF UNDER LCR 7 - 2

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2                   **CERTIFICATE OF SERVICE**  
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4                   I, Patricia S. Rose, declare under penalty of perjury that on the date below I caused the  
5 attached Motion to File Overlength Brief to be filed through ECF and served upon the below-  
6 listed parties via the method of service listed below

Party	Method of Service
Defendants c/o Jayne Freeman Keating et al Attorneys for Defendants	<input type="checkbox"/> E-Mail <input type="checkbox"/> E-Service by court

14  
15                   Dated this 11<sup>th</sup> day of May , 2021.  
16

17                   *s/Patricia S. Rose*  
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23                   PLAINTIFF'S MOTION  
24                   TO FILE OVERLENGTH  
                      BRIEF UNDER LCR 7 - 3

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